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10 *Attorneys for Defendant*
 11 *KG Mining (Bald Mountain) Inc.*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 LAURA LEIGH, individually, and WILD
 15 HORSE EDUCATION, a non-profit
 16 corporation,

17 Plaintiffs,

18 vs.

19 INTERIOR BOARD OF LAND APPEALS,
 20 UNITED STATES DEPARTMENT OF
 21 INTERIOR, BUREAU OF LAND
 22 MANAGEMENT, and KG MINING INC.,

23 Defendants.

24 Case No. 3:25-cv-00039-ART-CSD

25 **STIPULATION TO EXTEND TIME TO**
RESPOND TO PETITION FOR REVIEW
(First Request)

26 Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs Laura Leigh and Wild Horse Education
 27 (“Plaintiffs”); Defendants Interior Board of Land Appeals, United States Department of Interior,
 28 Bureau of Land Management (“Federal Defendants”); and Defendant KG Mining (Bald Mountain)
 Inc.¹ (“KG Mining”) hereby stipulate, agree, and respectfully request the Court extend the deadline
 for KG Mining to respond to the Petition for Review (ECF No. 1) (“Petition”) **from March 7,**
2025, to March 20, 2025.

29 The response deadline for Federal Defendants is currently March 10, 2025. KG Mining
 30 participated in the underlying administrative appeal as an intervenor. In this action, the Petition
 31 challenges the Interior Board of Land Appeals’ decision denying Plaintiffs’ standing to bring an
 32

33 ¹ Plaintiffs have named “KG Mining Inc.” as a Defendant, but no such entity exists.

1 administrative appeal. In light of this procedural posture, KG Mining and Federal Defendants agree
 2 the Federal Defendants should respond to the Petition first. KG Mining will respond ten (10) days
 3 after the Federal Defendants' response. Plaintiffs do not oppose this request.

4 The parties do not seek this extension for the purposes of delay and this is the first request
 5 for an extension of time for KG Mining to respond to the Petition. Accordingly, the parties request
 6 that the Court grant KG Mining an extension of time to respond to the Complaint until **March 20,**
 7 **2025.**

8 DATED: March 4, 2025.

9 GREENFIRE LAW, PC

10 /s/ Jessica L. Blome

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DATED: March 4, 2025.

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DATED: March 4, 2025.

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 20 *Mountain) Inc.*

21 IT IS SO ORDERED.

22 Dated: _____, 2025.

23

UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the law firm of Parsons Behle & Latimer and that on the 4th day of March, 2025, I filed a true and correct copy of the foregoing document, **STIPULATION TO EXTEND TIME TO RESPOND TO PETITION FOR REVIEW (First Request)**, with the Clerk through the Court's CM/ECF system, which sent electronic notification to all registered users as follows:

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